



Re: Third West Weekly Report

Joyce Ackerman to: Shepherd, Michael  
Cc: "Craig Barnitz (cbarnitz@utah.gov)"  
Bcc: Joyce Ackerman

02/08/2012 12:38 PM

From: Joyce Ackerman/R8/USEPA/US  
To: "Shepherd, Michael" <Michael.Shepherd@PacifiCorp.com>  
Cc: "Craig Barnitz (cbarnitz@utah.gov)" <cbarnitz@utah.gov>  
Bcc: Joyce Ackerman/R8/USEPA/US

Dear Mike - I have been behind on reading all the reports, but caught up this morning from the end of December to the present. I was very disappointed to read of several incidents by Newman employees violating required procedures for the exclusion zone. The incident of a Newman employee trying to remove scrap metal from the exclusion zone was particularly egregious. I noticed that even when R&R would warn about visible dust emissions, Newman failed to take action. It appeared from the reports that their performance improved slightly in recent weeks, but I am concerned that it may be temporary.

It appears that Newman is not following the procedures set forth in the Work Plans approved by EPA and Utah DEQ. I recommend immediate corrective action by Rocky Mountain Power to warn the contractor of their failure to follow correct procedures. As stated in the approval letters, EPA and/or Utah DEQ have the authority to require at any time that work be halted on the site. Such a step should not be necessary since you have approved Work Plans - your company just needs to enforce against your contractor Newman.

I am also concerned about the repeated detections of chrysotile in the perimeter monitoring. At first I thought these might be just background concentrations, but since they have been appearing almost every week, I am starting to think they are originating from some kind of site work. The most recent was a detection of 4 fibers resulting in an air concentration of nearly 0.02 structures/cc that could be migrating from the site to public spaces outside the site. Workers have some protection (except when they are removing their respirators inside the exclusion zone to talk), but the public has no such protection. I recommend that you and your contractors consider your activities to determine if there are sources of chrysotile in your construction activities that could be causing these releases, i.e., are materials being crushed or otherwise disturbed that could contain chrysotile?

I would appreciate your reply to these two issues. Please do not hesitate to contact me and Craig Barnitz with any questions/comments/corrections.

Joyce Ackerman, On-Scene Coordinator  
EPA Region 8  
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Denver, CO 80202  
Phone: 303-312-6822

"Shepherd, Michael"	Joyce & Craig, Attached are the reports for th...	02/01/2012 03:32:53 PM
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From: "Shepherd, Michael" <Michael.Shepherd@PacifiCorp.com>  
To: Joyce Ackerman/R8/USEPA/US@EPA, "Craig Barnitz (cbarnitz@utah.gov)" <cbarnitz@utah.gov>  
Date: 02/01/2012 03:32 PM  
Subject: Third West Weekly Report

Joyce & Craig,

Attached are the reports for the week of January 23, 2012.

All air monitoring results came back negative, except the positive hits of chrysotile on Thursday and Friday last week.

I should have an incident report to you by the end of the week.

Please let me know if you have any questions.

Thanks,

Mike Shepherd  
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Rocky Mountain Power - Major Projects  
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[attachment "Weekly Report 01-23 to 01-27-12.pdf" deleted by Joyce Ackerman/R8/USEPA/US]  
[attachment "Third West Weekly Log 2011-04.pdf" deleted by Joyce Ackerman/R8/USEPA/US]  
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